

Michael D. Hynes
DLA PIPER LLP (US)
51 John F. Kennedy Parkway, Suite 120
Short Hills, New Jersey 07078-2704
michael.hynes@dlapiper.com
Phone: (973) 520-2550
Fax: (973) 520-2551

Attorneys for Defendant Robert D. Keller

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ROBERT DE VITO, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

LIQUID HOLDINGS GROUP, INC.,
BRIAN M. STORMS, KENNETH D.
SHIFRIN, PETER R. KENT, RICHARD
SCHAEFFER, BRIAN FERDINAND,
JAY BERNSTEIN, DARREN DAVY,
DAVID FRANCESCANI, WALTER
RAQUET, THOMAS ROSS, VICTOR
SIMONE, JR., DENNIS SUSKIND,
ALLAN ZAVARRO, and SANDLER,
O'NEILL & PARTNERS, LP.,

Defendants.

Civil Action No. 2:15-cv-06969-KM-JBC

UNOPPOSED APPLICATION FOR ADMISSION
PRO HAC VICE OF JOHN J. CLARKE, JR.

MICHAEL D. HYNES, of full age, hereby declares as follows:

1. I am a member of DLA Piper LLP (US), attorneys for defendant Robert D. Keller in this action. I am a member in good standing of the Bars of the State of New Jersey and of this Court. I am not under suspension or disbarment in these courts or in any other court or jurisdiction.

2. I am submitting this declaration in support of the application of defendant Robert D. Keller for the admission *pro hac vice* of John J. Clarke, Jr., DLA Piper LLP (US), 1251 Avenue of the Americas, New York, New York 10020, to appear as co-counsel for Mr. Keller in this action.

3. Pursuant to Local Civil Rule 101.1, I understand that all pleadings, briefs, stipulations, and other papers filed with the Court shall be signed by me or another attorney associated with DLA Piper LLP (US) who is a member of the Bar of this Court. I agree to notify promptly the attorneys admitted *pro hac vice* of the receipt of all notices, orders and pleadings in this action.

4. Pursuant to Local Civil Rule 101.1, I understand that I shall be held responsible for the conduct of the case and shall be present before the Court during all phases of these proceedings, unless expressly excused by the Court, and will be held responsible for the conduct of the attorneys admitted *pro hac vice*.

5. On behalf of Mr. Keller, I respectfully request that the Court grant this application for the admission *pro hac vice* of John J. Clarke, Jr. to appear and participate in this matter pursuant to Local Civil Rule 101.1(c.).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct based upon my personal knowledge.

EXECUTED this 2nd day of September 2016, at New York, New York.

s/ Michael D. Hynes
Michael D. Hynes